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November 5, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, DC 20554

Re: *Ex Parte* CC Docket No. 92-105
Use of N11 Codes and Other Abbreviated Dialing Arrangements

Dear Mr. Caton:

On yesterday, John Cohen, Debby Cole, and I, all of AT&T Corp., met with Elizabeth Nightingale and Kris Monteith of the Common Carrier Bureau's Network Services Division. We discussed AT&T's positions as previously presented in this proceeding, and provided the Commission new data citing the operational and public policy successes resulting from the successful implementation of the nation's first 311 non-emergency calling program in Baltimore, Maryland.

In particular, we discussed the following positions, which AT&T stated in its comments on the petitions for reconsideration in the above-captioned proceeding: (1) that the six month time limit for 311 implementation for wireline carriers should be affirmed, (2) that the Commission should reconsider its requirement that wireless carriers make 311 service available within six months of a governmental entity's request, and (3) that the Commission should clarify the 311 non-emergency service obligations to be imposed on wireless carriers, and that these service obligations should not be as demanding as those for the 911.

Additionally, we addressed concerns raised in the petition for reconsideration by the International Association of Fire Chiefs (IAFC), which alleges that implementation of 311 will cause customer confusion, be expensive to implement, and that there are no data to support the effectiveness of the 311 non-emergency system. As AT&T stated in its comments on the IAFC's petition, the record in this proceeding already contains ample evidence to support the Commission's decision. Nevertheless, to address these assertions, we provided the Commission a copy of an article taken from the October 2, 1997 edition of The Washington Post newspaper which cites the success of the 311

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non-emergency program in Baltimore, Maryland. We also provided the Commission a copy of the Baltimore Police Department's evaluation of this program. The Police Department's report showed that the introduction of 311 service dramatically enhanced the over all efficiency of 911 service by -

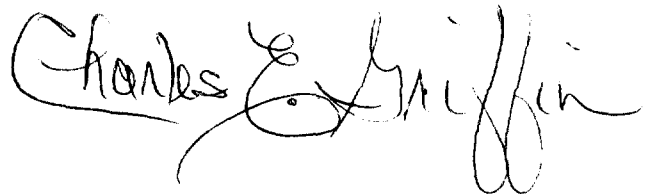
- Reducing 911 calls for police service by 25%.
- Reducing the number of 911 calls placed on hold by 82%.
- Permitting a 69% reduction in abandoned 911 calls.
- Reducing the average response time by 911 operators from six to two seconds.

It is significant and compelling to note that the State of Maryland is so pleased with the Baltimore 311 experience that it has announced plans to establish state funding to help other local communities implement 311 programs.

Based in part on Baltimore's success, and the need to implement more proactive policing policies in their respective communities, the cities of Los Angeles, California, Chicago, Illinois, Detroit, Michigan, and San Jose, California are also planning to introduce 311 service. And significantly, AT&T is not the only carrier marketing 311 service. Other carriers either currently marketing or planning to market 311 service include Pacific Telesis, GTE, and Ameritech.

This *ex parte* is being filed today due to the lateness of yesterday's meeting. Two copies of this Notice are being submitted to the Secretary of the Commission in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Griffin". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Attachments

cc: E. Nightingale
K. Monteith

**BALTIMORE
POLICE
DEPARTMENT**

COMMUNICATIONS
DIVISION

3-1-1
NON-EMERGENCY
TELEPHONE
NUMBER

7142a001.cdr/lm

FIRST
ANNUAL
PROGRAM
EVALUATION

October 1996/September 1997



**BALTIMORE POLICE DEPARTMENT
COMMUNICATIONS DIVISION
3-1-1 NON-EMERGENCY TELEPHONE NUMBER
FIRST ANNUAL PROGRAM EVALUATION**

(October 1996/September 1997)

*Thomas C. Frazier
Police Commissioner*

*John F. Reintzell
Major/Director
Communications Division*

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September 26, 1997

Baltimore Police Department
3-1-1 Project, Department of Justice
COPS Office
First Annual Evaluation (October 1996/September 1997)

The Baltimore Police Department, working in tandem with the Justice Department's Office of Community Oriented Policing Services (COPS) and AT&T Government Markets, launched a 3-1-1 non-emergency telephone number aimed at reducing the workload of the current 9-1-1 communications system. Though responsible for saving many lives, the 9-1-1 system is inundated with non-emergency requests. In 1995, the Baltimore Police Department handled 1,331,601 9-1-1 calls. Of those, 60 percent or 798,960 were deemed non-emergency. The goal of the 3-1-1 non-emergency telephone number is to reduce congestion by diverting non-emergency calls from the 9-1-1 Center. By diverting calls, 9-1-1 calltakers are freed to more efficiently handle calls of an emergency nature. Additionally, officers are more readily available to respond to emergency situations and engage in proactive policing methods.

In the company of Attorney General Janet Reno, Mayor Kurt Schmoke, and Police Commissioner Thomas Frazier, the 3-1-1 system was launched on October 2, 1996. Through the consideration of the COPS Office a \$349,787 grant afforded the Baltimore Police Department the opportunity to be the pilot program for the new 3-1-1 system. Advertising the slogan, "*When there's urgency but no emergency*", a multi-media public service campaign was implemented to heighten public awareness. Using public service spots (i.e., television, radio, and print media), the public was educated on when to use 3-1-1 and the importance of using it correctly. Upgrades to telephone systems, and hardware and software programs, were developed to bring the 3-1-1 system on-line. Initial costs for public education and upgrades were in excess of 1.3 million dollars.

The Communications Division has twenty-five terminals, nine are being used by 3-1-1 operators. The terminals are interchangeable, giving the ability to alternate between 3-1-1 and 9-1-1 calls for service. Today, the 3-1-1 Center is manned by sixty-one officers, most of whom are limited duty personnel. Their training consists of a one day orientation and a three day training program. Upon completion, they receive two weeks of on-the-job training and are provided a standard operating procedure manual as a reference guide.

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The 3-1-1 system is structured to receive direct calls, transfers from 9-1-1, and transfers from districts. In addition, 3-1-1 handles 685-DRUG, 685-GUNS, and Metro Crimes Stopper calls. The 3-1-1 operators have wide discretion in handling calls for service. Calls can be deferred to various sources within and outside the agency or handled through electronic reporting (see appendix A).

Since the inception of 3-1-1, there has been an increase of 8.8 percent in *calls for service*. The 9-1-1 calls for police service have decreased by 24.8 percent - a **significant reduction in workload for 9-1-1 calltakers** (see appendix B). This reduction has dramatically enhanced the overall efficiency of the 9-1-1 calltaker position.

Improvements: (see appendix C)

- 78.5 percent **decrease** in total positions busy.
- 67.0 percent **reduction** in average answer time.
- 35.0 percent **reduction** in average abandoned time.
- 69.2 percent **reduction** in abandoned calls.
- 82.2 percent **reduction** in calls receiving a recording.
- 17.0 percent **decrease** in times operators are busy on calls.

From 1990-1995, there was an **average** annual increase of 3.7 percent of 9-1-1 calls dispatched to patrol. In 1996, there was a 4.1 percent **decrease** in *dispatched calls* - **attributed to 3-1-1** (see appendix D). Since the inception of 3-1-1, there has been an overall 6.6 percent **decrease** in calls dispatched (see appendix E). This decrease is based on a comparison of calls for the period of October 1992 - September 1996 and October 1996 - September 1997. The 1995 24.8 percent decrease in calls for police service in comparison to the total calls dispatched decline of 6.6 percent, indicates that personnel in the 3-1-1 Center are forwarding a high percentage of calls (37.8 percent) for dispatch.

The overall increase in calls for service, and the reduction in workload for 9-1-1 calltakers, would indicate that the public is responding in a positive manner to the 3-1-1 campaign.

After one year of operation, a foundation has been established that gives the 3-1-1 Center a positive direction. Although total calls have increased, we can conclude that 3-1-1 has contributed to significantly improving the overall efficiency of the 9-1-1 calltaker position. A recent Communications Division staff study concluded that the service level of the 9-1-1 calltaker position has improved from 77.0 percent to 93.5¹ percent since implementation of the 3-1-1 Center.

After the first six months of operation, identified needs and ideas for enhancing the overall efficiency of the 3-1-1 Center were established. Our objective was to close the gap between work reduction for 9-1-1 calltakers (-19.9 percent after six months of operation) and calls dispatched to patrol officers (-4.7 percent after six months of operation) - eventually

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decreasing both categories to 30 percent each.² The six month evaluation identified the following needed enhancements:

- Assess and improve how calls are classified by 9-1-1 calltakers, with the goal of directing more calls to 3-1-1.
- As a means of analyzing 3-1-1 calls, establish procedures that will categorize the disposition of calls received, to include calls dispatched.
- Enhance training through needs assessment and analysis of daily responsibilities.
- Institute additional quality assurance procedures to ensure proper handling of 3-1-1 calls.
- Initiate surveys to district commanders, citizens, and community organizations to obtain feedback with regard to the quality of 3-1-1 service.
- Continuously analyze workload to ensure proper allocation of manpower.
- Continue to educate the public on proper usage of 3-1-1.

Through close cooperation with our Management Information Systems Division, we have been able to extract information designed to assist in gauging the performance and accountability of our 3-1-1 Center. A quality assurance unit was established to monitor customer satisfaction. Weekly quality assurance surveys indicate an overall 98.2 percent citizen satisfaction rate with request for service calls to the 3-1-1 Center (see appendix F). Training and refinement of standard operating procedures have also contributed to enhancing the overall performance of our 3-1-1 operators. Surveys completed by district commanders, shortly after the completion of the six month evaluation, have given the division a base line from which to gauge how 3-1-1 is impacting various police functions within the districts. Additional surveys will be distributed to determine any improvements and/or adverse impacts resulting from the implementation of 3-1-1. Recent workload and staffing studies have helped to maintain an appropriate number of personnel and ensure proper distribution of 3-1-1 operators and 9-1-1 calltakers.

The 3-1-1 Center is preparing to utilize Local Area Network (LAN) computers between the 3-1-1 Center, police districts, and neighborhood service centers. The initial trial period will consist of three computers in the 3-1-1 Center, one computer at the supervisor's position, and one computer each at two neighborhood service centers and two police districts. Total cost to fully implement operation of the LAN computer (i.e., nine police districts, nine neighborhood service centers, and all 3-1-1 center positions) and all other grant related costs are estimated to be \$405,558 (see appendix G). This figure is projected to be \$55,771 in excess of the awarded grant. The LAN computer will improve our system of accountability and ensure quicker distribution and dissemination of caller information and requests.

After one year of operation, our 3-1-1 operators are handling approximately 1,635 calls daily, or 35.2 percent of the calls coming into the Communications Division. Our operators are working diligently to improve the overall efficiency of the 3-1-1 Center. Through positive direction, we anticipate that 3-1-1 will meet the division's goal of enhancing quality of service and reducing the volume of calls to patrol officers. The 3-1-1 concept has proven to be a viable method for meeting the community policing goals of the Baltimore Police Department.

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APPENDIX A

INCOMING 3-1-1 CALLS

3-1-1 GROUP

- Direct Dialed 3-1-1 Call
- 9-1-1 Call Transferred to 3-1-1
- Transferred from Police 396-exchange
- 685-DRUG
- 685-GUNS

3-1-1 ACTION TAKEN

- Dispatch Police
- Transfer to Fire/Ambo Dispatch
- Transfer to Control One (Public Works)
- Refer to Neighborhood Service Center (NSC)*
 - ☐ Caller Calls NSC
 - ☐ Form Sent NSC
- Electronic Report taken by 3-1-1 Operator
- Numbered Drug Form – referred to C.I.B.**
- Numbered Guns Form – Referred to C.I.B.**

* NSC is a one stop contact and referral point for all city services. There are nine locations throughout the city. The NSC boundaries correspond with police district boundaries.

** C.I.B. (Criminal Investigation Bureau)

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APPENDIX B

**COMPARISON OF 9-1-1 REQUESTED FOR POLICE
(FIRE CALLS EXCLUDED)**

MM/YY	PD 9-1-1	MM/YY	PD 3-1-1	CHANGE	PCT. CHNG
OCT 95	103,693	OCT 96	82,468	(21,225)	-20.5
NOV 95	86,065	NOV 96	66,384	(19,681)	-22.9
DEC 95	81,586	DEC 96	68,912	(12,674)	-15.5
JAN 96	84,015	JAN 97	68,506	(15,509)	-18.5
FEB 96	77,465	FEB 97	61,712	(15,753)	-20.3
MAR 96	88,705	MAR 97	69,995	(18,710)	-21.1
APR 96	94,675	APR 97	72,567	(22,108)	-23.4
MAY 96	101,708	MAY 97	76,380	(25,328)	-24.9
JUN 96	103,7442	JUN 97	73,724	(30,018)	-28.9
JUL 96	108,254	JUL 97	72,383	(35,872)	-33.1
AUG 96	108,048	AUG 97	73,836	(34,212)	-31.7
SEP 96	97,813	SEP 97	67,641	(30,173)	-30.8
TOTAL	1,135,770		854,507	(281,263)	-24.8

Note: September 1997 projected statistics are based on first fourteen (4) days.

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APPENDIX C

9-1-1 PERFORMANCE STATISTICS

Comparison of time period October 1995 to September 1996 (before 3-1-1) and October 1996 to September 1997 (after 3-1-1). Below are performance statistics for the answering of emergency 9-1-1 calls, (September projected for 1997)

before 3-1-1 average 219 hours per month "total positions busy"

after 3-1-1 average 47 hours per month "total positions busy"

Reduction 172 hours per month = 78.5 percent decrease

before 3-1-1 average answer time was 6 seconds

after 3-1-1 average answer time was 2 seconds

Reduction of 4 seconds = 67 percent reduction

before 3-1-1 average abandoned time was 17 seconds

after 3-1-1 average abandoned time was 11 seconds

Reduction of 6 seconds = 35 percent reduction

before 3-1-1 percentage of calls abandoned was 6 percent

after 3-1-1 percentage of calls abandoned was 2 percent

Reduction in abandoned calls = 69.2 percent

before 3-1-1 percentage of calls receiving recording was 18%

after 3-1-1 percentage of calls receiving recording was 5%

reduction in calls receiving a recording = 82.2 percent

before 3-1-1 average time between incoming calls was 70 seconds

after 3-1-1 average time between incoming calls was 138 seconds

increase of 68 seconds = increase of 97.1 percent

before 3-1-1 percentage time operators busy on calls was 59 percent

after 3-1-1 percentage time operators busy on calls was 42 percent

decrease of operators on calls = 17 percent

As reflected above every statistic relative to 9-1-1 performance has improved with the implementation of the 3-1-1 NON-EMERGENCY UNIT coming on-line!

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APPENDIX D

DISPATCHED CALL 1990 TO 1996

YEAR	DISPATCHED	% CHANGE
1990	833,591	+4.6
1991	848,617	+1.8
1992	875,494	+3.2
1993	933,504	+6.6
1994	950,017	+1.8
1995	991,945	+4.4
1996	950,914	-4.1

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APPENDIX E

COMPARISON OF CALLS DISPATCHED TO PATROL

Prior to 3-1-1

Since 3-1-1

1995/1996	TOTAL	1995/1996	TOTAL	DIFFERENCE	PERCENTAGE
OCT 95	89,528	OCT 96	79,372	(10,156)	-11.3
NOV 95	75,278	NOV 96	68,351	(6,927)	-9.2
DEC 95	71,832	DEC 96	68,966	(2,866)	-4.0
JAN 96	65,968	JAN 97	68,710	2,742	+4.2
FEB 96	65,901	FEB 97	64,116	(1,785)	-2.7
MAR 96	77,014	MAR 97	74,976	(2,038)	-2.6
APR 96	82,326	APR 97	77,431	(4,895)	-5.9
MAY 96	87,334	MAY 97	82,970	(4,364)	-5.0
JUN 96	90,665	JUN 97	79,724	(10,941)	-12.1
JUL 96	91,243	JUL 97	82,070	(9,173)	-10.1
AUG 96	90,678	AUG 97	83,150	(7,528)	-8.3
SEP 96	83,096	SEP 97	76,860	(6,236)	-7.5
TOTAL	970,863		906,696	(64,167)	-6.6

Note: September 1997 – Projected statistics are based on the first fourteen (14) days.

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APPENDIX F

CITIZEN SATISFACTION SURVEY OF 3-1-1 CENTER

DATE OF SURVEY 1997	TOTAL CALLS SURVEYED	CALLERS SATISFIED	CALLERS DISSATISFIED	PERCENT SATISFIED
6/20-30/97	373	361	12	96.8
7/01-14/97	153	150	3	98.0
7/15-31/97	96	96	0	100.0
8/01-09/97	207	203	4	98.1
8/10-17/97	200	199	1	99.5
8/18-24/97	208	201	7	96.6
8/25-31/97	204	199	5	97.5
9/01-14/97	234	234	0	100.0
9/15-22/97	188	187	1	99.5
Total-Date	1863	1830	33	98.2

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APPENDIX G
ALLOCATION OF GRANT MONIES

AMOUNT	BALANCE	DESCRIPTION
	349,787.00	Original DOJ/COPS Grant
57,766.80	292,020.20	Computer equipment – LAN
3,582.62	288,437.58	Fiber Optics Systems – LAN Wiring
2,160.12	286,277.46	HP Electronics – intercoms
92,476.41	193,801.05	Bell Atlantic Tele. Upgrades/equipment
	193,801.05	Current Balance of Grant

The following cost are based upon price quotes or are projected costs:

AMOUNT	BALANCE	DESCRIPTION
	193,801.05	Current Grant Balance
22,285.00	171,516.05	Bell Atlantic Telephone Co. — one time charge to program all of their Telephone Central Offices in State of MD to recognize the three digits <u>3-1-1</u> in order to properly process 3-1-1 dialing Statewide.
60,480.00	111,036.05	Bell Atlantic Telephone for recurring Local Access Fees for two year project. Figures are projected.
32,626.20	78,409.85	Bell Atlantic Telephone for recurring dedicated circuits for two years. Figures are projected.
7,500.00	70,909.85	Targus for data base development (MSAG) for selective routing of 3-1-1 calls.
12,000.00	58,909.85	Targus data base updates for two years @ \$500.00 per month.
62,136.08	(3,226.23)	US Communications – LAN computer equipment to place equipment in all 3-1-1 positions, police stations and neighborhood services centers.
2,545.00	(5,771.23)	Compucom HP printers/equipment for LAN.
30,000.00	(35,771.23)	Semcor for DataBase development.
20,000.00	(55,771.23)	Semcor for DataBase maintenance.

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FOOTNOTES

- 1 Workload and Staffing Analysis, 9-1-1 Calltaker Position. (July 30, 1997), Lieutenant James E. Buckmaster and Sergeant Nelson A. Herrman (Communications Division, Baltimore Police Department).
The Communications Division had a Call Center Management Information System (CCMIS), which is a Lotus program provided by Northern Telecom, Inc. for the purpose of analyzing the performance of the 9-1-1 calltaker position. A 100 percent service level would require the following level of performance:
 - Average talk time of sixty (60) seconds or less.
 - Average not ready time of sixty (60) seconds or less.
 - Average time spent on outgoing calls of thirty (30) seconds or less.
 - No more than one call in queue.
 - Requires that 98% of calls are answered in ten (10) seconds or less.
- 2 Police Executive Research Forum Concept Paper, "Redirecting 9-1-1 Calls: An Evaluation of the Baltimore 3-1-1 Project". (October 3, 1996), Dr. Colleen Cosgrove and Dr. Dennis J. Kenney.